

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, *et al.*

Plaintiffs,

v.

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS, *et al.*

Defendants.

Case Number: 1:23-cv-10301-AS

**DEFENDANT KENNETH E. MAPP IS SEEKING TO JOIN THE GOVERNMENT’S
REPLY TO FURTHER SUPPORT ITS MOTION TO DISMISS AND TO JOIN THE
ARGUMENTS NOTED IN DEFENDANT CONGRESSWOMAN STACEY PLASKETT’S
REPLY IN FURTHERANCE OF HER MOTION TO DISMISS THE PLAINTIFFS’
SECOND AMENDED COMPLAINT**

COME NOW, Defendant GOVERNOR KENNETH E. MAPP, and respectfully requests that this Court grant leave for Defendant Governor Mapp to join in and incorporate in his Reply as part of his Motion to Dismiss the Plaintiffs’ Second Amended Complaint, the arguments set forth in the reply of support of Defendant Government of the Virgin Islands’ Motion to Dismiss (Docket number 158) and to further incorporate as part of his reply in furtherance of his motion to dismiss the SAC, the arguments of Defendant Congresswoman Stacey Plaskett’s reply in further support of her motion to dismiss Plaintiffs’ individual and class action Second Amended Complaint, (Docket number 162). To the extent that these arguments are applicable to Governor Mapp. Defendant Mapp states as follows:

1. Plaintiffs filed their initial Complaint on November 22, 2023, and filed an Amended Complaint on December 13, 2023. An “amended” Second Amended Complaint has now been filed.

2. Defendant has reviewed the responses, arguments and amended complaints of Plaintiffs and plaintiffs, despite their voluminous arguments, citations and exhibits have failed to set forth any act, overt or otherwise that Defendant Governor Mapp committed in his personal or in his official capacity that support any of the allegations made against Mapp by the Plaintiffs as a matter of law or of fact.

3. Defendant Governor Mapp continues to deny the allegations made against him in Plaintiffs' initial Complaint, the allegations made in the Plaintiffs' Second Amended Complaint and now the allegations made in their amended Second Amended Complaint.

WHEREFORE, Defendant Governor Mapp, except as noted otherwise, respectfully joins in the Reply arguments set forth by the Government of the U.S. Virgin Islands and that of Defendant Congresswoman Stacey Plaskett in opposition to the Second Amended Complaint and in support of their Motions to dismiss the SAC.

Dated: August 28, 2024,

Respectfully Submitted,



/s/ Kenneth E. Mapp
KENNETH E. MAPP, *pro se*

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